

From: "Meraj Abdul-Qadir" <mabdulq@qwest.com>
To: <Martha.Tria@state.tn.us>, <Ron.Jones@state.tn.us>
Date: 10/1/03 1:50PM
Subject: Qwest's Responses to TRAs First Set of Data Requests in Docket 03-00502

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2003 OCT -1 PM 1:56

T.R.A. DOCKET ROOM

Via Email to Ron Jones and Martha Tria
Via Facsimile (615) 532-4698 to Ron Jones

Attached are Qwest's responses to the Tennessee Regulatory Authority's data requests dated September 16, 2003 in connection with the Notice of Filing regarding Docket No. 03-00502; Workshop to Gather Information from the Telecommunications Industry Related to Preventing Violations of Tenn.Code.Ann. 65-21-114.

If you have any questions regarding the attached responses, please contact me.

(See attached file: Qwest's Responses to Set 1.pdf)

Meraj Abdul-Qadir
Law Department
Qwest
1801 California, Suite 4900
Denver, Colorado 80202
Telephone: (303) 672.2786

Tennessee
03-00502
Tennessee Regulatory Authority 1-001

INTERVENOR: Tennessee Regulatory Authority``

REQUEST NO: 001

Describe the manner in which you are able to provide telecommunications service in compliance with Tenn. Code Ann. paragraph 65-21-114(a). If you do not currently take steps to ensure compliance with paragraph 65-21-114(a), explain your reason for not doing so.



TENNESSEE DATA REQUES

RESPONSE:

Qwest receives a Network Data Mover (NDM) file approximately every two weeks from BellSouth which contains the necessary information to allow calls that would otherwise incur a toll charge to be properly identified as local and provided free of charge. The BellSouth files aide Qwest in maintaining compliance with Tenn. Code Ann. Section 65-21-114(a).

Tennessee
03-00502
Tennessee Regulatory Authority 1-002

INTERVENOR: Tennessee Regulatory Authority``

REQUEST NO: 002

Identify any technical, operational, administrative or other difficulties encountered when attempting to comply with Tenn.Code Ann. paragraph 65-21-114(a).



TENNESSEE DATA REQUES

RESPONSE:

Qwest has not had any technical, operational, administrative or other difficulties with the above listed interface.

Tennessee
03-00502
Tennessee Regulatory Authority 1-003

INTERVENOR: Tennessee Regulatory Authority^^

REQUEST NO: 003

Provide a suggestion for how this workshop should proceed.



TENNESSEE DATA REQUES

RESPONSE:

Since Qwest has not encountered any difficulties with compliance, Qwest has no suggestions on how the workshop should proceed.

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September 30, 2003

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VIA OVERNIGHT DELIVERY

SARA KYLE, COMMISSIONER
TN REGULATORY AUTHORITY

Ms. Sara Kyle, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

Re: Compliance with T.C.A. § 65-21-114
Long Distance Wholesale Club

Dear Ms. Kyle:

Long Distance Wholesale Club ("LDWC") is in receipt of correspondence from the Tennessee Regulatory Authority ("TRA") regarding the above-noted rule. It is the intent of LDWC that this response will satisfy the request from the TRA in relation to T.C.A. § 65-21-114.

Currently, LDWC does not offer telecommunications services within the State of Tennessee. As a result, the Company respectfully requests an exemption from taken steps to ensure compliance with T.C.A. § 65-21-114 as stipulated in T.C.A. § 65-21-114(a) and Docket No. 03-00502.

Thank you for your time involved in this matter. If you have any questions regarding this correspondence, please contact the undersigned at (214) 424-1713.

Respectfully,



Ben Boaitey
Regulatory Analyst

cc: Kevin Allen
Manager, Regulatory Affairs



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September 30, 2003

VIA OVERNIGHT DELIVERY

Ms. Sara Kyle, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

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SARA KYLE, COMMISSIONER
TN REGULATORY AUTHORITY

Re: Compliance with T.C.A. § 65-21-114
eMeritus Communications, Inc.

Dear Ms. Kyle:

eMeritus Communications, Inc. ("eMeritus") is in receipt of correspondence from the Tennessee Regulatory Authority ("TRA") regarding the above-noted rule. It is the intent of eMeritus that this response will satisfy the request from the TRA in relation to T.C.A. § 65-21-114.

Currently, eMeritus uses the TAR codes provided by BellSouth to determine which toll calls should be zero-rated. However, please note that when billing system limitations prevent the Companies from being able to use the TAR codes to determine intra-county calls, the Companies have a process in place to ensure that all calls within 0 to 22 miles are automatically zero-rated. Furthermore, in the event that a customer was billed for an intra-county call, the Company will reimburse the customer promptly upon notification of the disputed charge.

Thank you for your time involved in this matter. If you have any questions regarding this correspondence, please contact the undersigned at (214) 424-1713.

Respectfully,

A handwritten signature in black ink, appearing to read 'Ben'.

Ben Boaitey
Regulatory Analyst

cc: Kevin Allen
Manager, Regulatory Affairs

Please note that eMeritus address has changed to 1600 Viceroy Drive, Dallas, Texas 75235.



James B. Wright
Senior Attorney

RECEIVED
2003 OCT -1 AM 8:18
T.R.A. DOCKET ROOM
14111 Capital Boulevard
Wake Forest, NC 27587-5900
Mailstop NCWKFR0313
Voice 919 554 7587
Fax 919 554 7913
james.b.wright@mail.sprint.com

September 30, 2003

Director Ron Jones
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

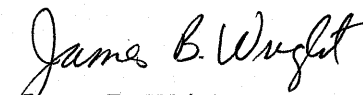
RE: Docket No. 03-00502, Workshop to Gather Information from the
Telecommunications Industry Related to Preventing Violations of
Tenn. Code Ann. § 65-21-114

Dear Director Jones:

Attached is Sprint's response to the Tennessee Regulatory Authority's Notice of Filing dated September 16, 2003 in the above-referenced docket. Sprint's response is complete with the exception of details to one answer which should be available by October 8, 2003.

If you have questions regarding this information, please contact Laura Sykora at (919) 554-7323 or Kaye Odum at (919) 554-5277.

Sincerely,


James B. Wright

Attachment

C: Laura Sykora
Kaye Odum

**SPRINT'S RESPONSE TO TRA DATA REQUEST
DATED 9/16/03 RE:**

**Workshop to Gather Information from the Telecommunications
Industry Related to Preventing Violations of
Tenn. Code Ann. §65-21-114**

1. Describe the manner in which you are able to provide telecommunications service in compliance with Tenn. Code Ann. § 65-21-114(a). If you do not currently take steps to ensure compliance with § 65-21-114(a), explain your reason for not doing so.

Response:

United Telephone-Southeast, Inc.—Sprint's ILEC (United Telephone-Southeast, Inc.) provides telecommunications service in compliance with Tenn. Code Ann. § 65-21-114(a) first, by running a program which compares all UTSE end-users' TAR code information for the originating number and terminating number and removes intra-county calls from the billing records. In addition, UTSE provides all UTSE ANIs to the BellSouth statewide database. BellSouth then makes the statewide TAR code database available to UTSE, and UTSE runs toll tapes for its end-user customers against the TAR code database, so that any call with the same TAR code (county) for the UTSE originating number and another carrier's terminating number is removed from billing. The UTSE ANI/TAR code information provided to the BellSouth statewide database is the manner in which UTSE complies with the Tennessee Code in conjunction with intrastate traffic for IXC's and intrastate intraLATA traffic for CLEC's in UTSE's territory.

Sprint Communications Company L.P.—Sprint's IXC subscribes to the BellSouth statewide TAR code database and runs toll tapes against this TAR code database so that any intra-county calls are removed.

Sprint Communications Company L.P.—Sprint's CLEC provides service to end-users through the resale of a third-party's service; Sprint is still securing the details of this provisioning and will provide additional information by October 8, 2003.

2. Identify any technical, operational, administrative or other difficulties encountered when attempting to comply with Tenn. Code Ann. § 65-21-114(a).

Response:

Since the database that identifies an intra-county call is dynamic, there are constantly issues with the provision of this service. Some of the difficulties Sprint encounters are:

9/30/03

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Norstan Network Services Response to:

Tennessee Regulatory Authority Docket: 03-00502 in re: Workshop to Gather Information from the Telecommunications Industry Related to Preventing Violations of Tenn. Code Ann. §65-21-114.

2003 OCT -1 AM 9:16

TELE. DOCKET ROOM

- **Describe the manner in which you are able to provide telecommunications service in compliance with Tenn. Code Ann. §65-21-114(a). If you do not currently take steps to ensure compliance with §65-21-114(a), explain your reason for not doing so.**

In order to comply with Tenn. Code Ann. §65-21-114, Norstan Network Services (NNS) could create a special query within our billing system to locate TN calls that originate and terminate within the same county and proactively issue credits to those customers involved. However, this would be a cumbersome process and would conflict with point (c) in your notice which indicates that "Nothing in this section is intended to modify or repeal ... the right of the telephone companies to earn a fair rate of return."

For the following reasons, NNS is unable to comply with Tenn. Code Ann. §65-21-114:

- NNS is a reseller of network services. The calls that NNS bills our TN customers for are billed to us by the underlying carrier.
- If NNS were to credit TN customers for these calls, NNS would likely be unable to recover these costs from the underlying carrier.
- **Identify any technical, operational, administrative or other difficulties encountered when attempting to comply with Tenn. Code Ann. §65-21-114(a).**
 - NNS is a reseller of network services. The calls that NNS bills our TN customers for are billed to us by the underlying carrier.
 - If NNS were to credit TN customers for these calls, NNS would likely be unable to recover these costs from the underlying carrier.
 - The underlying long distance carrier receives the calls from the LEC (local exchange carrier). If these calls are non-toll calls, the LEC should not be passing them to the long distance carrier.
 - If the TN customer is dialing "1" before the phone number for calls within his or her county, he is signaling the LEC to send the call over long distance lines.
 - If the customer is utilizing long distance services for calls that could have utilized local services, the customer should be responsible to pay for services rendered.
- **Provide a suggestion for how this workshop should proceed.**

It is NNS's recommendation that the TN workshop work with the LEC's to ensure that calls within counties are carried on the local network and are not sent to long distance carriers. The workshop should also address how to notify the public that they should not dial "1" for calls within their county.



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2003 OCT -1 AM 9:16

T.R.A. DOCKET ROOM

September 29, 2003

Mr. Ron Jones
Director
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37423-0505

RE: Workshop to Gather Information from the Telecommunications Industry Related
to Preventing Violations of Tenn. Code Ann. 65-21-114

Dear Mr. Jones:

Scott County Telephone Cooperative (SCTC) takes steps to be in compliance with Tenn.
Code Ann. 65-21-114(a) by:

Submitting data to the TAR Code Administrator to be included on the TAR Code
tapes.

SCTC bills long distance calls for one carrier. If by chance call records for in-
county calls appear on a toll tape, then the billing system drops these calls before
they reach the customers' bills.

Calls made either from SCTC customers or to SCTC customers are routed over long-
distance facilities. SCTC has no direct facilities with Bell South, the other ILEC in
Hancock County.

SCTC has experienced problems when other county residents try to call SCTC customers
and are billed for long-distance by IXC's. We have contacted the TRA about this, but
have been referred back to Bell South. We have worked with Bell South, but it appears
that some IXC's do not reference the TAR Code Tape.

If you have any questions, please feel free to contact me.

Sincerely,

Daniel E. Odom
Chief Financial Officer



121 Woodland Street • P.O. Box 488 • Gate City, VA 24251
Phone: 276-452-3333 or (866) SIMPLY2 / (866) 746-7592
www.mounet.com

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T.R.A. DOCKET ROOM

September 29, 2003

Mr. Ron Jones
Director
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37423-0505

RE: Workshop to Gather Information from the Telecommunications Industry Related
to Preventing Violations of Tenn. Code Ann. 65-21-114

Dear Mr. Jones:

MountaiNet Long Distance (MLD) is a long-distance reseller that receives call records from another long distance carrier. At this time, that long distance carrier still includes in-county calls on their toll tape. MLD bills the customer from the toll tape, but credits the customer's bills for the calls. MLD is working with the long-distance carrier to try to get the carrier to stop sending the in-county call records to be billed.

If you have any questions, please feel free to contact me.

Sincerely,

Daniel E. Odom
Chief Financial Officer
MountaiNet Long Distance



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121 Woodland Street • P.O. Box 488 • Gate City, VA 24251

Phone: 276-452-3333 or (866) SIMPLY2 / (866) 746-7592

www.mounet.com

T.R.A. DOCKET ROOM

September 29, 2003

Mr. Ron Jones
Director
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37423-0505

RE: Workshop to Gather Information from the Telecommunications Industry Related
to Preventing Violations of Tenn. Code Ann. 65-21-114

Dear Mr. Jones:

MountaiNet Telephone Company (MTC) is a competitive local service provider in
Tennessee. MTC is not providing local service at this time.

If you have any questions, please feel free to contact me.

Sincerely,

Daniel E. Odom
Chief Financial Officer
MountaiNet Telephone Company

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2003 OCT -1 AM 9:15

T.R.A. DOCKET ROOM

Colorado Office
1601 Dry Creek Drive
Longmont, CO 80503
phone 720.494.5800
fax 720.494.6600
www.intrado.com

Via Federal Express

September 30, 2003

Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

**RE: Workshop to Gather Information from the Telecommunications Industry
Related to Preventing Violations of Tenn. Code Ann. § 65-21-114**

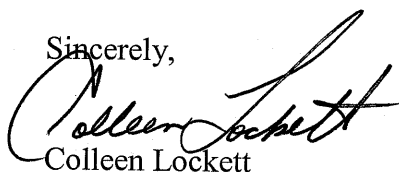
Dear Tennessee Regulatory Authority;

Intrado Communications Inc. ("ICI") does not currently conduct business in the State of Tennessee. Therefore, ICI does not have any operational data to base a response to the information requested in the above mentioned matter.

Please date-stamp the enclosed extra copy of this letter and return it in the self-addressed postage-paid envelope provided.

Should you or anyone else at the Regulatory Authority have any questions regarding this response, please do not hesitate to contact me at (720) 864-5506.

Sincerely,



Colleen Lockett
Regulatory Administrator
clockett@intrado.com

Encl



American Telecommunications Systems, Inc.



2003 OCT -1 AM 9:13

T.R.A. DOCKET ROOM

4450 Belden Village St. N.W., Suite 602
Canton, Ohio 44718
(330) 649-9265
(330) 649-9275 FAX

September 25, 2003

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RON JONES

OCT - 1 2003

Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

TN REGULATORY AUTHORITY

Re: Response to Docket No. 03-00502, Inquiries Relating to Preventing Violations of
Tenn. Code Ann. 65-21-114

To Whom It May Concern,

We are a reseller, not a facilities-based provider. Our underlying carriers are Qwest, Global Crossing, and AT&T through Alliance Group Services. We have no facilities, therefore, are unable to have any control over how calls are routed or point-to-point termination.

We bill our customers according to the call detail records that are sent to us from our underlying carriers. We trust, and are assured by our underlying carriers, that they are compliant with all codes and regulations.

The only suggestion we would have, for this workshop to proceed, is for any further inquiries to be directed to facilities-based providers only.

If we can be of further service in any way, please let us know.

Sincerely,

Mr. Bill Stathakaros
President

BS/ms

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T.R.A. DOCKET ROOM

Bellerud Communications, LLC
2023 Sam Houston Ave. #2
Huntsville, Texas 77340
936-295-9600

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RON JONES

OCT - 1 2003

September 25, 2003

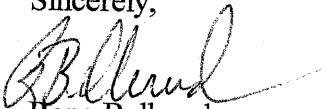
TN REGULATORY AUTHORITY

Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN. 37243-0505

Re: Workshop to Gather Information from the Telecommunications Industry Related
to Preventing Violations of Tenn. Code Ann. 65-21-114. (Docket No: 03-00502)

1. Bellerud Communications, LLC does not currently take steps to ensure compliance with 65-21-114, because all of our services are provided by ILEC's in the state of Tennessee and we have toll blocks on all of our end users on our platform with the incumbent provider. We are not facility based we depend solely on the services provided by the ILEC.
2. We have not had any technical, operational, administrative or other difficulties concerning the Tenn. Code Ann. 65-21-114.
3. This workshop should proceed targeted directly to providers that handle toll calls, or that is capable of determining the route of a call such as a facility based company.

Sincerely,


Rene Bellerud
President

LOADPOINT

Ron Jones
Director
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

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2003 OCT -1 AM 9:13

RECEIVED
RON JONES

September 30, 2003

OCT - 1 2003

TN REGULATORY AUTHORITY

DOCKET NO: 03-00502

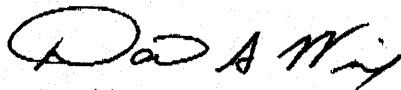
IN RE: Response to inquiries concerning Preventing Violations of Tenn. Code Ann. § 65-21-114

DATE: September 30, 2003

VIA FAX: (615)-741-5015

This letter is Loadpoint, LLC's response to the TRA letter dated September 16, 2003 concerning Tennessee Code Ann. § 65-21-114 and how Loadpoint, LLC complies.

- *Describe the manner in which you are able to provide telecommunications service in compliance with Tenn. Code Ann § 65-21-114(a). If you do not currently take steps to ensure compliance with § 65-21-114(a), explain your reason for not doing so.*
- Loadpoint, LLC does not provide voice services at this time.
- *Identify any technical, operational, administrative or other difficulties encountered when attempting to comply with Tenn. Code Ann. § 65-21-114(a).*
- Loadpoint, LLC has not encountered any issues with complying with Tenn. Code Ann. § 65-21-114 due to not offering voice services at this time.
- *Provide a suggestion for how this workshop should proceed*
- The compliance of telecommunications providers to this Code affects many residential and commercial customers. The workshop should be open to any and all interested parties.



David A. Wise
General Manager
(615)-221-4217
Loadpoint, LLC

KNOLOGY®

Telephone Cable TV Internet

September 30, 2003

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T.R.A. DOCKET ROOM

VIA FACSIMILE
615-741-5015Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

Re: Docket 03-00502

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RON JONES

SEP 30 2003

TN REGULATORY AUTHORITY

Dear Mr. Waddell,

In response to the Tennessee Regulatory Authority's data request dated September 16, 2003 I provide the following response on behalf of Knology of Tennessee, Inc. (Knology).

1. Describe the manner in which you are able to provide telecommunications service in compliance with Tenn. Code. Ann. § 65-21-114(a). If you do not currently take steps to ensure compliance with § 65-21-114(a), explain your reason for not doing so.

Response: Knology provides telecommunications services in compliance with Tenn. Code. Ann. §65-21-114(a) by utilizing data provided by the Traffic Routing Administrator.

2. Identify any technical, operational, administrative or other difficulties encountered when attempting to comply with Tenn. Code. Ann. §65-21-114(a)

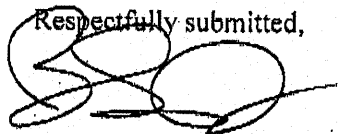
Response: Knology has not encountered any technical, operational, administrative or other difficulties when attempting to comply with Tenn. Code. Ann. §65-21-114(a)

3. Provide a suggestion for how this workshop should proceed.

Response: At this time Knology does not have any specific suggestions for workshop format.

Should you have any questions about the enclosed material, please don't hesitate to call me on (706) 645-3966.

Respectfully submitted,

Bruce Schoonover, Jr.
Director - Regulatory Affairs
Knology, Inc.

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2003 OCT -1 AM 9:17



BellSouth Long Distance, Inc.
400 Perimeter Center Terrace
Suite 400
Compliance
Atlanta, Georgia 30346

TRA. DOCKET ROOM

Mary Jean Dennis
Director
Business Implementation &

770 352-3077
Fax: 678 443-3470

September 30, 2003

Mr. Ron Jones, Director
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

**Re: Docket No. 03-00502; Workshop to Gather Information from the
Telecommunications Industry Related to Preventing Violations of Tenn. Code
Ann. § 65-21-114**

Dear Mr. Jones,

BellSouth Long Distance, Inc., submits the following response to your request dated September 16, 2003, for information in the above referenced docket.

BellSouth Long Distance is able to provide telecommunication service in compliance with Tennessee Code Ann. §65-21-114 (a) by utilizing two methodologies. For complex voice customers who purchase services from Section 7 of the Company's Tennessee Rate Sheet No. 3, the Company's underlying carrier utilizes TAR codes to ensure compliance. For residential and small business customers who purchase service from Section 4 of the Company's Tennessee Rate Sheet No. 3, the Company utilizes an internally developed mileage based formula to ensure compliance. Calls are compared against this calculation and zero rated as appropriate.

BellSouth Long Distance has not encountered any significant difficulties complying with this requirement.

BellSouth Long Distance does not have any suggestions for this workshop.

Sincerely,

A handwritten signature in cursive script that reads "Mary Jean Dennis".



US LEC Corp.
Morrocroft III
6801 Morrison Boulevard
Charlotte, North Carolina 28211

704.319.1000
Fax 704.319.3090
800.588.7280
Website www.uslec.com

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T.R.A. DOCKET ROOM

September 30, 2003

Mr. Ron Jones
Director
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Re: Docket 03-00502, Workshop to Gather Information from the
Telecommunications Industry Related to Preventing Violations of
Tenn. Code Ann. § 65-21-114

Dear Mr. Waddell:

Pursuant to Tennessee Regulatory Authority Notice dated September 16,
2003, US LEC of Tennessee Inc. (US LEC) provides the following responses.

Issue 1. Describe the manner in which you are able to provide
telecommunications service in compliance with Tenn. Code Ann. §
65-21-114.

US LEC has developed end user local calling areas to correspond to the entire county where the US LEC customer premise is located. Therefore, no US LEC customers are billed for intra-county calls. In further compliance measures, US LEC provides updates to the Tax Area Record (TAR) code database maintained by BellSouth Telecommunications, Inc.-Tennessee. These updates are in the form of data files containing the US LEC end-user customer number, effective date of the number, US LEC Operating Company Number (OCN), TAR code and the corresponding county. By updating the TAR code database, US LEC helps ensure that other service providers have its information available for accurate countywide call processing.

Issue 2. Identify any technical, operational, administrative or other
difficulties encountered when attempting to comply with Tenn. Code
Ann. § 65-21-114.

US LEC has no extraordinary difficulties to report at this time.



Page 2

Issue 3. Provide a suggestion for how this workshop should proceed.

US LEC currently has no suggestions.

Please contact me at 704-319-1946 if you have any questions.

Very truly yours,

A handwritten signature in black ink, appearing to read "Greg Lunsford".

Greg Lunsford
Regulatory Manager



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2003 OCT -1 AM 9:15

T.R.A. DOCKET ROOM

Jennifer McMann
Regulatory Compliance

Tel 720-888-3372
Fax 720-888-5134

September 30, 2003

Joe Werner, Chief
Telecommunications Division
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

RE: Data Request for Month Ending August, 2003

Dear Mr. Werner:

Enclosed please find Level 3 Communications, LLC's Wireline Activity report.
This request covers the period for the month ending August, 2003.

Sincerely,

A handwritten signature in cursive script that reads "Jennifer McMann".

Jennifer McMann
Manager, Regulatory Compliance

Enclosure

Wireline Activity in Tennessee – CCN Authority

Lines in Service as of month ending (1): 08/31/2003
Month/Day/Year

Carrier Name: Level 3 Communications, LLC

Name of person who prepared data: Jennifer McMann

Telephone number of person who prepared data: 720-888-3372

Please provide the number of switched voice grade equivalent access lines (64 kbps/4KHz equivalent) including digital and analog, single line and multi-line, that your company as in service in Tennessee in the following categories:

County	Number of Lines (2)			
	Resale (3)	UNE (4)	Own Facilities (5)	Total
Residential	0	0	0	0
Total	0	0	0	0
Business	0	0	0	0
Total	0	0	0	0

Provide an estimate of the investment to date by your company in telecommunications equipment and facilities that will be used to provide local telephone service in Tennessee. This estimate should include only facilities owned by your company and/or facilities leased for a term of five years or more. For purposes of this question, UNEs should not be considered as an investment in facilities.

\$29,496,511

1. This report is to be filed with the Tennessee Regulatory Authority on the last day of each month and is to report data in service as of the last day of the proceeding month. For example, on June 30, companies will submit access line data as of May 31st.
2. Exclude lines provided to the residences of employees.
3. Include Centrex stations purchased for resale (include in total and footnote separately).
4. Include lines in which at least one Unbundled Network Element (UNE) is used to provide service.
5. Include access lines provided over carrier's own loop facilities (copper, fiber, etc.)(no UNES).



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2003 OCT -1 AM 10:33

T.R.A. DOCKET ROOM

4300 Six Forks Road
Raleigh, NC 27609-5746
(919) 863-7000
(800) 849-9100
(919) 863-7319 Fax
www.britelecom.net

VIA FACSIMILE AND OVERNIGHT MAIL

October 1, 2003

Mr. Ron Jones
Director, Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

Re: Docket No. 03-00502, Implementation of County Wide Calling
Workshop to Gather Information from Telecommunications Industry
Related to Preventing Violations of Tenn. Code Ann. § 65-21-114

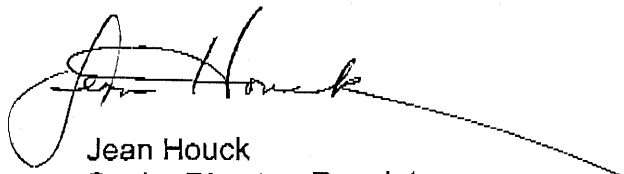
Dear Mr. Jones:

Enclosed is the response of Business Telecom, Inc. (BTI) to your request for
information concerning the manner in which BTI complies with Tenn. Code Ann.
§ 65-21-114(a).

If you have any questions regarding this matter please contact me at
919-863-7325.

Sincerely,

BUSINESS TELECOM, INC.


Jean Houck
Senior Director, Regulatory

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RON JONES

OCT - 1 2003

TN REGULATORY AUTHORITY

DOCKET 03-00502
WORKSHOP TO GATHER INFORMATION FROM THE
TELECOMMUNICATIONS INDUSTRY RELATED TO PREVENTING
VIOLATIONS OF TENN. CODE ANN. § 65-21-114

- Describe the manner in which you are able to provide telecommunications service in compliance with Tenn. Code Ann. § 65-21-114(a). If you do not currently take steps to ensure compliance with § 65-21-114(a), explain your reason for not doing so.

RESPONSE: BTI orders TAR (Taxing Area Rate) Code information from BellSouth. As part of that process, BTI submits a bi-monthly file to BellSouth containing the ten-digit telephone number and TAR Code for BTI customers in order that the information may be included in a statewide file maintained by BellSouth.

BTI receives the TAR Code information from BellSouth each month and loads the information into its billing system. Any calls received by BTI from its customers in Tennessee are processed against the TAR files and dropped from the billing database if the TAR Code associated with the originating number matches the TAR Code associated with the destination number.

- Identify any technical, operational, administrative or other difficulties encountered when attempting to comply with Tenn. Code Ann. § 65-21-114(a).

RESPONSE: BTI has experienced problems with customers calling claiming that calls were intra-county when the TAR Code file does not validate that both telephone numbers were located in the same county. If BTI can determine that there was an error in the TAR Code file then we will credit the customer's account.

The BellSouth service is not error free, there appears to be issues with ported numbers and the fact that not all CLECs report TAR Code and telephone number information to BellSouth. This is problematic and could explain the customer calls that BTI receives.

- Provide a suggestion for how this workshop should proceed.

RESPONSE: BTI does not have any suggestions as to how the proposed workshop should proceed. However, all CLECs operating in Tennessee should be required to provide TAR Code and telephone number information to either BellSouth or a third party administrator. This will ensure that all local telephone companies have access to accurate information in order to provide free intra-county calling in Tennessee.



Chapel Hill, Tennessee 37034

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2003 OCT -1 AM 10:33

T.R.A. DOCKET ROOM

September 30, 2003

Mr. Ron Jones, Director
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Director Ron Jones,

RE: DOCKET NO: 03-00502

This letter is in response to your letter dated September 16, 2003, to gather information from telecommunications industry related to preventing violations of Tenn. Code Ann. 65-21-114.

Q. (1) Describe the manner in which you are able to provide telecommunications service in compliance with Tenn. Code Ann. 65-21-114.

United Telephone receives a tar code file from BellSouth twice a month. This file consists of telephone numbers and counties for all participating LEC'S. United Telephone verifies the county or tar code of each originating and terminating call in this file. Any call identified by the afore mentioned tar code as a within county calling is not billed. This is in full compliance with Tenn. Code Ann. 65-21-114.

Q. (2) Identify any technical, operational, administrative or other difficulties encountered when attempting to comply with Tenn. Code Ann. 65-21-114.

All CLEC's phone numbers are not in the TAR data base.

Q. (3) Provide a suggestion for how this workshop should proceed.

All CLEC'S should be required to provide county codes to BellSouth on a regular basis. BellSouth should provide a weekly file for countywide calls.

Sincerely,

Herbert R. Bivens
General Manager

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RON JONES

OCT - 1 2003

TN REGULATORY AUTHORITY



TELEPHONE: (931) 668-4132 • WEBSITE: www.blomand.net
311 North Chancery Street • P. O. Box 670 • McMinnville, Tennessee 37111-0670

September 29, 2003 T.R.A. DOCKET ROOM

Director Ron Jones
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Dear Director Jones:

Ben Lomand Rural Telephone Cooperative, Inc. hereby responds to the Tennessee Regulatory Authority inquiries concerning county wide calling in correspondence dated September 16, 2003.

Ben Lomand Telephone Cooperative, Inc. has always participated in the county wide calling plan since its inception, even before the passage of Tenn. Code Ann. 65-21-114. Not only do we supply our numbers to the BellSouth county wide database, but we also have an internal program designed to drop out intra county calls from our billing records.

When calls between two points in the same county are not in an EAS area and does not involve a second company, it is merely dropped out of our billing records internally. If another telephone company is involved, the call is completed by dialing ten digits. A toll record is made and held for billing. Prior to billing the "to" and "from" numbers are compared in the TN TAR file provided by BellSouth. If the TAR codes match, the call is deleted from billing.

The difficulties we have encountered involve CLEC's not properly sending their numbers to the TN TAR database. This database is the only mechanism that determines county calling between multiple companies. We have also encountered problems with both CLEC's and ILEC's not updating to the database in a timely manner.

The workshop should require all providers to participate in the TN TAR database and to submit their information timely.

Respectfully submitted,

Levoy Knowles
CEO

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RON JONES

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TN REGULATORY AUTHORITY



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T.R.A. DOCKET ROOM

September 30, 2003

Mr. Ron Jones, Director
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Director Ron Jones,

RE: DOCKET NO: 03-00502

This letter is in response to your letter dated September 16, 2003, to gather information from telecommunications industry related to preventing violations of Tenn. Code Ann. 65-21-114.

Q. (1) Describe the manner in which you are able to provide telecommunications service in compliance with Tenn. Code Ann. 65-21-114.

United Telephone Company bills UTC Long Distance customers per a billing agreement. United verifies the county of each originating and terminating call from the TAR code file provided by BellSouth. Any call within county boundaries as identified by the TAR code file is not billed.

Q. (2) Identify any technical, operational, administrative or other difficulties encountered when attempting to comply with Tenn. Code Ann. 65-21-114.

All CLEC's telephone numbers are not in the TAR data base.

Q. (3) Provide a suggestion for how this workshop should proceed.

All CLEC's should be required to provide county codes to Bell South on a regular basis. BellSouth should provide a weekly file for countywide calls.

Sincerely,

Herbert R. Bivens
Chief Officer

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RON JONES

OCT - 1 2003

TN REGULATORY AUTHORITY